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The requested extensions and adjournment are GRANTED. The deadline to file a Second Amended Complaint is **January 31, 2025**. The deadline for Defendants to answer or otherwise respond to the Second Amended Complaint is **March 17, 2025**. The stay of discovery is extended to **March 17, 2025**. The initial pre-trial conference is adjourned to **March 25, 2025 at 10 a.m.** The motion to dismiss the First Amended Complaint is dismissed as MOOT in light of this request, without prejudice to refiling after Plaintiff files the Second Amended Complaint. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 21.

**SO ORDERED.**

Date: December 18, 2024  
New York, New York

*Jennifer Rochon*  
**JENNIEER L. ROCHON**  
**United States District Judge**

December 17, 2024

**BY ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, New York 10007

re: Colon v. Pina, et al. 24-CV-5381 (JLR)

Dear Judge Rochon,

My office represents the Plaintiff Antonio Colon (“Plaintiff”) in the above matter. In that capacity, I write jointly with Daniel Hay, Esq., counsel for Defendants Lorenzo Pina and Global Trade Bridge Corp. (“Defendants”) to respectfully request permission to file a Second Amended Complaint by January 31, 2025, and for Defendants to have until March 17, 2025 to respond to the Second Amended Complaint. The parties are also requesting to extend the Stay of discovery until March 17, 2025 and for the Initial Conference which is currently scheduled for February 12, 2025, to be adjourned until a date after March 17, 2025.

By way of background, Defendants filed a Motion to Dismiss Plaintiff’s First Amended Complaint. Plaintiff’s Opposition to Defendants’ motion is currently due by December 20, 2024. In light of Defendants’ motion, Plaintiff intends to Amend his complaint to withdraw certain claims and to add additional allegations to his anticipated amended complaint to avoid wasting judicial resources and unnecessary motion practice. The parties have conferred about dates for the anticipated Second Amend Complaint and Defendants’ response and propose January 31, 2025 for the deadline to file the Second Amended Complaint and March 17, 2025 for the response. The reason for the lengthy extension is that in addition to the upcoming holidays, the attorneys for the Parties have several motions, depositions as well as a trial coming up. Additionally, many of the documents at issue in this case are in Spanish and must be translated into English. The Parties have also agreed to extending the Stay of discovery until March 17, 2025. Lastly, the parties request that the Initial Conference be adjourned until after March 17, 2025 so that the parties are in the best position to have a productive conference with the Court.

The Parties thank the Court for its consideration herein.

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Respectfully submitted,

/s/ Evan Brustein

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cc: All parties (via ECF)